

1 REBECCA L. MASTRANGELO, ESQ.  
Nevada Bar No. 5417  
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4 Fax (702) 384-1460  
rmastrangelo@rmcmlaw.com  
5 Attorneys for Defendant  
TK ELEVATOR CORPORATION f/k/a  
6 THYSSENKRUPP ELEVATOR CORPORATION

7 UNITED STATES DISTRICT COURT

8 DISTRICT OF NEVADA

9 NATHAN WHITE,

10 Plaintiff,

11 vs.

12 TK ELEVATOR CORPORATION f/k/a  
13 THYSSENKRUPP ELEVATOR  
CORPORATION; DOES I through X, inclusive;  
14 and ROE BUSINESS ENTITIES I through X,  
inclusive,

15 Defendants.  
16

CASE NO. 2:21-cv-01696-ART-VCF

**STIPULATION AND ORDER TO  
EXTEND TIME TO FILE  
OPPOSITION AND REPLY**

17 IT IS HEREBY STIPULATED between Plaintiff, Nathan White, and Defendant, TK Elevator  
18 Corporation f/k/a Thyssenkrupp Elevator Corporation, by and through their respective counsel of  
19 record, that the time to file an Opposition to Plaintiff's Motion to Compel [36] filed on November  
20 3, 2023 be extended, through and including November 22, 2023, and Plaintiff will have to and  
21 including December 4, 2023 to reply to Defendant's opposition.

22 Dated this \_\_\_ day of November, 2023.

Dated this \_\_\_ day of November, 2023.

23 SHOOK & STONE, CHTD.

24 ROGERS, MASTRANGELO, CARVALHO &  
MITCHELL

25 /s/ John B. Shook

/s/ Rebecca L. Mastrangelo

26 John B. Shook Esq.  
Nevada Bar No. 5499  
27 Lynn R. Shoen, Esq.  
Nevada Bar No. 1197  
28 710 S. Fourth Street  
Las Vegas, Nevada 89101  
Attorneys for Plaintiff

Rebecca L. Mastrangelo, Esq.  
Nevada Bar No. 5417  
700 South Third Street  
Las Vegas, Nevada 89101  
Attorneys for Defendant

**ORDER**

IT IS SO ORDERED this 13th day of November, 2023.



\_\_\_\_\_  
U.S. MAGISTRATE JUDGE

SUBMITTED BY:

ROGERS, MASTRANGELO, CARVALHO  
& MITCHELL

*/s/ Rebecca L. Mastrangelo*

REBECCA L. MASTRANGELO, ESQ.

Nevada Bar No. 5417  
700 S. Third Street  
Las Vegas, Nevada 89101  
*Attorney for Defendant*

## Carolyn Mangundayao

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**Subject:** RE: TK adv. White

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**From:** Lynn Shoen <[lshoen@shookandstone.com](mailto:lshoen@shookandstone.com)>

**Sent:** Thursday, November 9, 2023 3:43 PM

**To:** Rebecca Mecham <[rmecham@rmcmlaw.com](mailto:rmecham@rmcmlaw.com)>; Rebecca Mastrangelo <[rmastrangelo@rmcmlaw.com](mailto:rmastrangelo@rmcmlaw.com)>; Kiana A. O'Day <[KO'Day@shookandstone.com](mailto:KO'Day@shookandstone.com)>; John Shook <[johnshook@shookandstone.com](mailto:johnshook@shookandstone.com)>

**Cc:** Kathy Vigil <[kvigil@rmcmlaw.com](mailto:kvigil@rmcmlaw.com)>

**Subject:** RE: TK adv. White

You can affix John's signature.

Thanks, Lynn



**Lynn Shoen | Attorney**

**P: 702.570.0000 | C: 702-380-8981 | F: 702.485.5266 | Direct: 702-380-8981**

**Offices:** Downtown Las Vegas, NV: 710 S. 4th Street, Las Vegas, NV 89101  
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**From:** Rebecca Mecham <[rmecham@rmcmlaw.com](mailto:rmecham@rmcmlaw.com)>

**Sent:** Thursday, November 9, 2023 1:05 PM

**To:** Rebecca Mastrangelo <[rmastrangelo@rmcmlaw.com](mailto:rmastrangelo@rmcmlaw.com)>; Lynn Shoen <[lshoen@shookandstone.com](mailto:lshoen@shookandstone.com)>; Kiana A. O'Day <[KO'Day@shookandstone.com](mailto:KO'Day@shookandstone.com)>; John Shook <[johnshook@shookandstone.com](mailto:johnshook@shookandstone.com)>

**Cc:** Kathy Vigil <[kvigil@rmcmlaw.com](mailto:kvigil@rmcmlaw.com)>; Rebecca Mecham <[rmecham@rmcmlaw.com](mailto:rmecham@rmcmlaw.com)>

**Subject:** RE: TK adv. White

Rebecca Mecham  
Paralegal

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**From:** Rebecca Mastrangelo <[rmastrangelo@rmcmlaw.com](mailto:rmastrangelo@rmcmlaw.com)>

**Sent:** Thursday, November 9, 2023 12:56 PM

**To:** Lynn Shoen <[lshoen@shookandstone.com](mailto:lshoen@shookandstone.com)>; Rebecca Mecham <[rmecham@rmcmlaw.com](mailto:rmecham@rmcmlaw.com)>; Kiana A. O'Day <[KO'Day@shookandstone.com](mailto:KO'Day@shookandstone.com)>; John Shook <[johnshook@shookandstone.com](mailto:johnshook@shookandstone.com)>

**Cc:** Kathy Vigil <[kvigil@rmcmlaw.com](mailto:kvigil@rmcmlaw.com)>

**Subject:** RE: TK adv. White

Sure thing.

Becki – please revise and send it back to Lynn for approval.

Thanks, everyone.

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**From:** Lynn Shoen <[lshoen@shookandstone.com](mailto:lshoen@shookandstone.com)>

**Sent:** Thursday, November 9, 2023 12:52 PM

**To:** Rebecca Mecham <[rmecham@rmcmlaw.com](mailto:rmecham@rmcmlaw.com)>; Kiana A. O'Day <[KO'Day@shookandstone.com](mailto:KO'Day@shookandstone.com)>; John Shook <[johnshook@shookandstone.com](mailto:johnshook@shookandstone.com)>

**Cc:** Rebecca Mastrangelo <[rmastrangelo@rmcmlaw.com](mailto:rmastrangelo@rmcmlaw.com)>; Kathy Vigil <[kvigil@rmcmlaw.com](mailto:kvigil@rmcmlaw.com)>

**Subject:** RE: TK adv. White

Hello Rebecca

Please put in 10 days to file Reply.

Thanks, Lynn



**Lynn Shoen | Attorney**

**P: 702.570.0000 | C: 702-380-8981 | F: 702.485.5266 | Direct: 702-380-8981**

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**From:** Rebecca Mecham <[rmecham@rmcmlaw.com](mailto:rmecham@rmcmlaw.com)>

**Sent:** Thursday, November 9, 2023 12:24 PM

**To:** Lynn Shoen <[lshoen@shookandstone.com](mailto:lshoen@shookandstone.com)>; Kiana A. O'Day <[KO'Day@shookandstone.com](mailto:KO'Day@shookandstone.com)>

**Cc:** Rebecca Mecham <[rmecham@rmcmlaw.com](mailto:rmecham@rmcmlaw.com)>; Rebecca Mastrangelo <[rmastrangelo@rmcmlaw.com](mailto:rmastrangelo@rmcmlaw.com)>; Kathy Vigil <[kvigil@rmcmlaw.com](mailto:kvigil@rmcmlaw.com)>

**Subject:** TK adv. White

Counsel,

Attached is a draft Stipulation and Order to Extend Time to File Opposition and Reply. Please let me know what reply deadline to insert in the Stipulation.

If the stipulation meets with your approval, please provide your authorization to utilize your e-signature for submission to the Court.

Thank you,



Rebecca Mecham, Paralegal to  
Stephen H. Rogers, Esq.  
Rebecca L. Mastrangelo, Esq.  
William C. Mitchell, Esq.  
and Kerry O. Pluck, Esq.  
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